

1 **THOMAS F. PITARO, ESQ.**
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3 (702) 382-9221
4 Attorney for Defendant
MILLICENT EPINO

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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 **UNITED STATES OF AMERICA,**

9 Plaintiff,

10 vs.

11 **MILLICENT EPINO,**

12 Defendant.
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Case No. 13-MJ-00271-CWH

15 **STIPULATION TO CONTINUE PRELIMINARY HEARING**

16 **IT IS HEREBY STIPULATED AND AGREED**, by and between **DANIEL G.**
17 **BOGDEN, ESQ.**, United States Attorney, and **CRISTINA SILVA, ESQ.**, Assistant United
18 States Attorney, counsel for the United States of America, and **THOMAS F. PITARO, ESQ.**,
19 counsel for Defendant, **MILLICENT EPINO**, that the preliminary hearing in the above-
20 captioned matter, currently scheduled for July 22, 2015, at the hour of 4:00 p.m., be vacated and
21 continued for thirty days, or to a date and time to be set by this Honorable Court.
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23 This stipulation is entered into for the following reasons:

24 1. The parties are finalizing the terms of a plea agreement. Additional time is needed
25 to get the plea agreement and change of plea date set.
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27 2. Denial of this request for continuance of the preliminary hearing would prejudice
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1 both the defendant and the government and unnecessarily consume this Court's valuable
2 resources, taking into account the exercise of due diligence.

3 3. Additionally, denial of this request for continuance could result in a miscarriage
4 of justice.

5 4. The additional time requested by this Stipulation is excludable in computing the
6 time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18,
7 United States Code, Section 3161(b) and Section 3161(h)(8)(A), considering the factors under
8 Title 18, United States Code, Sections 3161(h)(8)(B)(i) and 3161(h)(8)(B)(iv).

9 5. There have two previous request for continuance of the preliminary hearing
10 granted herein.

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12 **DATED** this 21st day of July, 2015.

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15 /S/ Thomas F. Pitaro
16 **THOMAS F. PITARO, ESQ.**
17 Counsel for Defendant

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20 /S/ Cristina Silva
21 **CRISTINA SILVA, ESQ.**
22 Assistant U. S. Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

Case No. 13-MJ-00271-CWH

6 vs.

7 MILLICENT EPINO,

8 Defendant.

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10 FINDINGS OF FACT

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
12 Court hereby finds that:

13 **IT IS THEREFORE ORDERED** that the preliminary hearing in the above captioned
14 matter currently scheduled for July 22, 2015, at the hour of 4:00 p.m. be vacated and continued
15 to Thursday, August 27, 2015, at the hour of 4:00 p.m.

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17 **DATED** this 22nd day of April, 2015.

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21 UNITED STATES MAGISTRATE JUDGE
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Law Office
of
Thomas F. Pitaro

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